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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

F I L E D

DEMANDED

JURY TRIAL

JAN 20 2023 *SMB*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

ZAKKIYYA A GREENE

JANE DOE 1 (J.M), JANE DOE 2 (J.M), JANE DOE 3 (J.M)

PLAINTIFF

VERSE

**CHICAGO PUBLIC SCHOOL
BURNHAM ELEMENTRY ADMINISTRATION STAFF
SHERYL FREEMAN (PRINCIPAL)
CASSANDRA LOCKRIDGE (ASSISTANT PRINCIPAL)**

DEFENDANT

**PEDRO MARTINEZ (CHIEF EXECUTIVE OFFICER/
SUPERINTENDENT)**

**CHICAGO PUBLIC SCHOOL DISTRICT #299
(NCES DISTRICT ID:1709930)**

CHICAGO BOARD OF EDUCATION

COMPLAINT

COMES NOW, PRO SE PLAINTIFF ZAKKIYYA GREENE in the above style and number to be determined by the court and bring forth this civil complaint against CHICAGO PUBLIC SCHOOL BURNHAM ELEMENTRY ADMINISTRATION STAFF, CHICAGO PUBLIC SCHOOL CHIEF OFFICER/ SUPERINTENDENT, CHICAGO PUBLIC SCHOOL DISTRICT #299, CHICAGO BOARD OF EDUCATION, and in support thereof will show unto the Court the following: Violation of Plaintiff First and Fourteenth Amendment Rights.

Factual Background

The Defendants in this case, have created an environment that violated the Plaintiffs listed above civil rights. The defendant having authority over the Plaintiff; put the Plaintiff in a position that the defendant and or any reasonable person should have known would cause harm to the Plaintiff. Violating Due Process of the law of Plaintiff rights as United States Citizens. The Defendants put the Plaintiff in a position that violated life, liberty, and or property without Due process of the law. The defendants have acted in deprivation under the color of law in Illinois that violated and or disregarded Plaintiff civil rights. The Defendants have caused, due to actions and authority over Plaintiff, loss of school-related expenses, wages and or employment, and medical expenses. The Defendants have caused Plaintiff to be denied the privileges of attending not only the neighborhood public school system but denied public school attendance. The Defendants have caused not only physical yet mental damage to Plaintiff. The Defendants discriminated against the Plaintiff making race and gender a factor while making non-ethical decisions toward Plaintiff. The Defendants created a grievance for Plaintiff and denied Plaintiff equal protection of the city, state, or local government rights, and Due process of law.

FACTS

I

That I am Zakkiyya Greene parent of **Jane Doe 1 (J.M)**, **Jane Doe 2 (J.M)**, and **Jane Doe 3 (J.M)** (I will refer to my children as **DOE** to reserve their privacy on public record at this time) (**Doe 1-3** will be referring from eldest to youngest).

II

That Defendant Pedro Martinez Chief Executive Officer of Chicago Public School, address 42 West Madison Street Chicago, IL 60602

III

That defendant Sheryl Freeman Principal of Burnham Elementary Chicago Public school located at 9928 South Crandon Avenue Chicago, IL 60617.

IV

That defendant Cassondra Lockridge Asst. Principal of Burnham Elementary Chicago Public School located at 9928 South Crandon Avenue Chicago, IL 60617.

V

That the defendant City of Chicago Public School District #299 located at 42 West Madison Street 2nd Floor Chicago, IL 60602-4413.

VI

That the defendant City of Chicago Public School Board of Education located at 1 North Dearborn Street Suite # 950 Chicago, IL 60602.

VII

That the Jane Doe's referenced above has been in Chicago Public School attendance on or about November of 2020 at the location of Edward Bouchet Elementary; 7355 South Jeffery Avenue Chicago Il, 60649.

VIII

That during their time of attendance at Chicago Public School Edward Bouchet located on 7355 South Jeffery Chicago, IL 60649, I Zakkiyya Greene and the **Jane Doe's** in reference was living at the location of 7255 South Bennett Chicago, IL 60617.

IX

That from on or about the 09th-27th of September 2021 complaints were made to Mrs.C Keneipp the first-grade teacher at Edward Bouchet Elementary, concerning JANE DOE 3 referenced above being bullied at the location of Edward Bouchet Elementary Chicago Public School location referenced above.

X

That from on or about the 28th day of September 2021 a conference was held with I and the school administrators at the location of Edward Bouchet Elementary (refer to the location above).

XI

That from on or about the 29th day of September 2021 a complaint was filed against Mrs. C Keneipp through telephone and Email, to the Illinois State Board of Education located on 555 West Monroe Street, Suite 900.

XII

That from on or about the October of 2021 JANE DOE 1-3 were transferred to Chicago Public School Burnham Elementary located on 9928 South Crandon

Chicago, IL 60617.

XIII

That from on or about the 7th day of December 2021 at Chicago Public School Burnham Elementary at the location of 9928 South Crandon Chicago, IL 60617 Chicago Public School Security officer Raymond Baines inappropriately grabbed JANE DOE 2 in an aggressive manner.

XIV

That from on or about the 7th day of December 2021 a 7th-grade young man grabbed Jane Doe 2 in an aggressive manner at the Chicago Public School Burnham Elementary.

XV

That from on or about the 8th day of December 2021 a conference about the incident in relation to the date of December 7th, 2021 complaint, was held with I (Plaintiff), JANE DOE 1, JANE DOE 2, and Chicago Public school Burnham Elementary administrators, the security officer, the gym teacher, and the two children involved (both male).

XVI

That from on or about the 8th day of December 2021 an incident report related to JANE DOE 1-3 was requested from Chicago Public School Burnham Elementary administrators.

XVII

That from on or about the 8th day of December 2021 the incident in relation to JANE DOE 1-3 was also reported Chicago Public School Student Safety operator Ceaser at the phone number (773-553-3335).

XVIII

That from on or about the 9th day of December 2021 incident report in relation to JANE DOE 1-3 was requested from Chicago Public School Burnham Elementary administrators, none was given.

XIX

That from on or about the 10th day of December 2021 JANE DOE 1-3 no longer attended class at Chicago Public School Burnham Elementary.

XX

That from on or about the 11th day of December 2021 thru the 14th day of February 2022 the Chicago Public School Burnham Elementary Harassed and threatened Plaintiff Zakkiyya Greene related to attendance issues at the facility.

XXI

That from on or about the 4th day of February 2022 a conference was held with Plaintiff Zakkiyya Greene and Chicago Public School Burnham Elementary administrators, an incident report in relation to JANE DOE 1-3 was requested.

XXII

That from on or about the 8th day of February 2022 Chicago Public School Student Safety Security supervisor Nick was asked for a follow-up on an incident report related to JANE DOE 1-3 from the 8th day of December 2021 at the Chicago public School Burnham Elementary (location refer above).

XXIII

That from on or about the 11th day of February 2022 an incident report related to JANE DOE 1-3 was given to Plaintiff Zakkiyya Greene from the Chicago Public School Burnham Elementary administrator Cassandra Lockridge.

XXIV

That from on or about the 14th day of February 2022 JANE DOE 1-3 returned in attendance at the location of Chicago Public School Burnham elementary (location refer above).

XXV

That from on or about the 22nd day of February 2022 Chicago Public School Burnham elementary staff member Joseph Puckett (unauthorized teacher) did not respond to JANE DOE 1 (student) complaint about a battery in the classroom.

XXVI

That from on or about the 22nd day of February 2022 Chicago Public School administrators Sheryl Freeman and Cassondra Lockridge did not respond to the battery complaints from student (JANE DOE 1) or parent.

XXVII

That from on or about the 22nd day of February 2022 the Chicago Police was called to Chicago Public School Burnham Elementary.

XXVIII

That from on or about the 22nd day of February 2022 the Chicago Police issued a police report for battery on JANE DOE 1 at Chicago Public School Burnham Elementary School.

XXIX

That from on or about the 22nd day of February JANE DOE 1 was taken to the emergency room about injuries sustained during battery incident at Chicago Public School Burnham Elementary (location refer above).

XXX

That from on or about the day 24th day of February, I the plaintiff tried to obtain a A summons from Court Branch for a warrant or Summons located at 727 E 111th St. for the child involved in the incident against JANE DOE 1.

XXXI

That from on or about the 24th day of February I the plaintiff was told by Court branch officer (location refer above) to contact the Chicago Police Special Victims Unit at the phone number 312-747-8247 and spoke with Detective Anderson. Detective Anderson instructed Plaintiff to call the Violent Crimes Unit branch of

the Chicago Police dept at 312-747-8271 to speak with Detective Allen.

XXXII

That on or about the 24th day of February Plaintiff tried contacting Detective Allen. Detective Allen was said to be off work on this date.

XXXIII

That on or about the 24th day of February 2022 the Chicago Police emergency phone number was contacted to arrest the offender in the incident against JANE DOE 1.

XXXIV

That day on or about the 24th of February the Illinois Board of Education investigator-special assistant and the assistant legal counsel were contacted by phone and Email regarding a complaint against Chicago Public School Burnham Elementary Staff members.

XXXV

That from on or about the 25th day of February the inspectorgeneral@cpsoig.org was contacted thru email regarding the complaint from the Chicago Public School Burnham Elementary.

XXXVI

That from on or about the 24th day of February the Chicago Public School Student Safety Center was contacted by telephone at number 773-553-3335.

XXXVII

That from on or about the 24th of February the Chicago Public School Student Protection Center was contacted by telephone at 773-535-4400.

XXXVIII

That day on or about the 25th of February 2022 the Chicago Police detective Allen was called again for assistance with the incident from February 22nd, 2022 police report.

XXXIX

That on or about the 25th of February 2022 the Chicago Police dept Emergency phone number was called again to arrest the offender in the incident from February 22nd, 2022 battery incident.

XL

That from on or about the 25th day of February 2022 the Chicago Police 4th district department located on 2255 East 103rd Street Chicago IL 60617 was called concerning the arrest of the offender from the incident on February 22nd, 2022.

XLI

That on or about the 25th day of February 2022 Chicago police officer Adams, Detective Guadinski, Sergent Anderson, and Commander at the Chicago police 4th The district was notified about I the Plaintiff needing assistance with the arrest of the offender from the battery incident on February 22nd, 2022.

XLII

That on or about the 25th day of February 2022 the Chicago Public School Student Safety Center was notified again about the incidents that were in an occurrence at the Chicago Public School Burnham Elementary at the telephone number 773-553-3335.

XLIII

That day on or about the 25th day of February 2022 the Chicago Public School

Network 13 also known as Chicago Public School District #299 was notified by telephone of the incidents that were in an occurrence at Chicago Public School Burnham Elementary.

XLIV

That on or about the 25th day of February 2022 investigator McClary from the Office of Inspector General of Chicago Public Schools was given information to report to the Law Department of OIG Office of Inspector General.

XLV

That day on or about the 25th day of February 2022 the Illinois Board of Education was contacted concerning incidents in an occurrence at the Chicago Public School Burnham Elementary.

XLVI

That on or about the 27th day of February 2022 the Chicago Public school student protection was notified again of the incident concerning the JANE DOE 1-3 at Chicago public schools.

XLVII

That on or about the 3rd of March 2022 Chicago police detective unit was contacted again concerning Detective Allen's service to the report received on the

incident that occurred on February 22nd, 2022, at Chicago Public School Burnham Elementary.

XLVIII

That on or about the 3rd of March 2022 the Chicago Police Emergency phone number was contacted about the arrest of the offender from the incident reported on February 22nd, 2022, at Chicago Public School Burnham Elementary.

XLIX

That1 on or about the 3rd of March 2022 the Law Department of the Officer Inspector General of Chicago public schools was contacted in relation to the incidents in an occurrence at the Chicago public school Burnham Elementary.

L

That on or about the 3rd of March 2022 Janelly Nieves Investigative aide of the Chicago Board of Education Law department investigative unit was contacted concerning the incidents in an occurrence at the Chicago Public School Burnham Elementary.

LI

That on about the 7th day of March 2022 the Chicago public school Chief Executive Officer Pedro Martinez and the Chief Education officer were contacted thru email in relation to the incidents that had been occurring at Chicago Public school Burnham elementary located at 9928 s Crandon Chicago, IL 60617.

LII

That JANE DOE 1-3 referenced above has not been in attendance at Chicago Public School and has not been assisted with any services provided by Chicago Public School Chief Executive Officer Pedro Martinez system for attendance.

LIII

That **Jane Doe 1-3** referenced above are members of the Cheerleading Team and Student Council at Chicago Public School Burnham Elementary.

LIV

That **Jane Doe 1-3** referenced above are straight-A students academically with no behavior issues at Chicago Public Schools.

LV

That **Jane Doe 3** has been placed in a grade up from her original status at Chicago Public School.

LVI

That Chicago Public School Chief Executive Officer Pedro Martinez acted upon Deprivation of rights under color of law.

LVII

That Chicago Public School Edward Bouchett administration team acted upon Deprivation of rights under color of law.

LVIII

That Chicago Public School Burnham Elementary administration team acted upon Deprivation of rights under color of law.

LVIX

That the Chicago Board of Education team acted upon the Deprivation of rights under color of law.

LX

That the CHICAGO PUBLIC SCHOOL DISTRICT #299
(NCES DISTRICT ID:1709930) acted upon Deprivation of rights under the
color of law.

LXI

That Chicago Public School Burnham Elementary Principal Sheryl Freeman acted
under the color of the state of Illinois.

LXII

That Chicago Public School Burnham Elementary Assistant Principal Cassandra
Lockridge acted under the color of the state of Illinois.

LXIII

That Chicago Public School Burnham Elementary Security Officer Raymond
Baines acted under the color of the state of Illinois.

LXIV

That Chicago Public School Burnham Elementary Gym teacher David Rossi acted
under the color of the state of Illinois.

LXV

That Chicago Public School Burnham Elementary (employee listed as other)

Joseph Puckett acted under the color of the state of Illinois.

LXVI

That the Defendants set in motion a series of acts by others or knowingly refusing to terminate a series of acts by other that they knew or reasonably should have known would cause others to inflict constitutional injury.

LXVII

That the Defendants have shown culpable action or inaction in training,

for supervision or control of subordinates.

LXVIII

That the defendant Pedro Martinez Chicago Public School Chief Executive Officer

conduct showed a reckless or callous indifference to the rights of Plaintiff.

LXIX

That the Defendants were negligent by failure to use care as a reasonable prudent and careful person would use under similar circumstances including a broad range of acts or failures to act that result in Plaintiff hardship.

LXX

That the Defendant Chicago Public School Chief Executive Officer/Superintendent Pedro Martinez was personally involved in the sense of helping to cause A CIVIL RIGHT VIOLATION and acted intentionally, with sadistic intent.

LXXI

That the Defendants created a policy or custom under which unconstitutional practices occurred and allowed the continuance of such a policy or custom.

WHEREFORE PREMISES CONSIDERED, Plaintiff, Zakkiyya Greene, and JANE DOE 1-3 Pray that this honorable court set a time and date to hear this matter with a Jury to determine a dollar amount that should be paid to the Plaintiff for Monetary, Compensatory and Punitive Damages.

Respectfully Submitted,

Zakkiyya Greene Pro Se Plaintiff
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